

JUSTIN C. BONUS, ESQ.

A T T O R N E Y A T L A W

JUSTIN C. BONUS, ESQ.
JUSTIN.BONUS@GMAIL.COM

118-35 QUEENS BOULEVARD, SUITE 400
FOREST HILLS, NY 11375

TEL. (347) 920-0160
FAX: (888) 237-8686

June 4, 2019

VIA ECF

Honorable District Judge Jerome B. Simandle
United States District Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Smith v. Burlington County, et al.*, 18 CV 5088 (JBS) (KMW)

Your Honor:

I represent plaintiff Kevin Smith in the above-referenced action. I write with consent of counsel for the United States ("USA") to respectfully request a second, final 21-day extension of plaintiff's deadline to respond to the USA's motion to dismiss (DE #42).

The USA's motion was filed on April 15, 2019. Following an extension granted at plaintiff's request on May 2, 2019, plaintiff's current response deadline is June 6, 2019. Plaintiff's brief will be authored by Gabriel P. Harvis, Esq, co-counsel to the undersigned. Mr. Harvis is presently preparing Fed. R. Civ. P. 12(b)(6) opposition briefs on behalf of plaintiffs in two federal wrongful conviction actions, which collectively challenge over forty-eight years of confinement. *See Jackson v. County of Nassau*, 18 CV 3007 (JS) (GRB) (E.D.N.Y.); *Hincapie v. City of New York*, 18 CV 3432 (PAC) (RWL) (S.D.N.Y.). If it should please the Court, the proposed extension should allow Mr. Harvis to properly attend to these overlapping commitments.

Accordingly, plaintiff respectfully requests that his response deadline be extended to June 27, 2019. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Justin C. Bonus

cc: All Counsel